REMARKS

Applicants wish to thank the Examiner for the careful consideration given to this case. In the Office Action claims 1-20 were rejected by the Examiner. More specifically:

- Claims 1-4, 6, 8, 9, 11-18 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Published Application No. 2002/0156812 (Krasnoiarov) in view of U.S. Published Application No. 2004/0109197 (Gardaz);

- Claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Krasnoiarov and Gardaz in view of U.S. Patent No. 6,184,878 (Alonso);

- Claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Krasnoiarov and Gardaz in view of U.S. Published Application No. 2002/0049842 (Huetsch); and

- Claims 10 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Krasnoiarov and Gardaz in view of U.S. Published Application No. 2003/0123622 (Gillford).

Upon entry of this Response, claims 1-20 will remain pending. For the reasons set forth below, Applicants request that the above-listed rejections be withdrawn.

Claims 1-11

Applicants submit that claim 1, as currently amended, is nonobvious over Krasnoiarov in view of Gardaz because the cited references, whether considered alone or in combination, fail to teach or suggest each and every limitation of claim 1. *See* MPEP §2143 (stating that one of the elements of a *prima facie* case of obviousness under §103(a) is that the prior art references must

teach or suggest all of the claim limitations). More particularly, Applicants submit that the combination of Krasnoiarov and Gardaz fails to teach or suggest, among other things, "delivering the content to a plurality of presentation devices" as recited in amended claim 1.

Krasnoiarov teaches a method for "satisfying a single request from a client for a plurality of content components derived from content hosted by a plurality of distinct, separately accessible component servers." Krasnoiarov, Abstract. As the content components are received from the component servers, a main server "receives [each] content component, stores it, and awaits for remaining content components to be returned." *Id.*, paragraph [0096]. Upon receiving all of the content components, the main server "communicat[es] the resulting content, processed and assembled, to the user terminal from which the original request was issued." *Id.*, paragraph [0098]. Krasnoiarov assembles content including a plurality of different data types, but merely teaches distributing the resulting content **to a single user terminal over a single delivery channel** between the main server and the user terminal that issued the original request. As such, Krasnoiarov does not teach "delivering the content to a plurality of presentation devices." For at least that reason, Krasnoiarov cannot satisfy the limitations of claim 1.

Gardaz does not overcome the deficiencies of Krasnoiarov. Gardaz teaches a server that processes threads in parallel and converts files from one format to another, as stated by the Examiner. The system in Gardaz "provides an output image associated with [a] multi-resolution representation to the second computer when the web page is accessed by the second computer." Gardaz, Abstract. In other words, Gardaz suffers from the same deficiency as Krasnoiarov in that it does not teach delivery of "content to a plurality of presentation devices" as required by currently amended claim 1.

Nor does Alonso resolve the shortcomings of Krasnoiarov and Gardaz. Alonso describes a method and apparatus for interactively accessing information from the WWW suitable for use in an interactive information distribution system (Alonso 1:64-66). A video server receives a request from a subscriber for information, which is then retrieved and sent to the requesting subscriber. (Alonso 2:1-11). Thus, Alonso does not teach delivery of "content to a plurality of presentation devices" as required by claim 5, which depends on and incorporates the limitations of presently amended claim 1.

Nor does Huetsch resolve the shortcomings of aforementioned references. Heutsch teaches methods of balancing a processing load in a network among a plurality of servers, and teaches "receiving a client request at the load balancer from a client, ..., establishing a communication link between the client and the selected processing server, and authorizing the selected processing server to server the client request." Thus, Heutsch does not teach delivery of "content to a plurality of presentation devices" as required by claim 7, which depends on and incorporates the limitations of presently amended claim 1.

Finally, Gifford also fails to resolve the shortcomings of aforementioned references. Gifford teaches methods of allowing a user to send an e-mail message to interact with unified communications services. This allows a user to call or fax individuals and perform other functions directly from an interface within email. Gifford does not teach delivery of "content to a plurality of presentation devices" as required by claims 10 and 19, which depends on and incorporates the limitations of presently amended claims 1 and 12, respectively.

As such, Applicants submit that independent claim 1 is nonobvious over the combination of Krasnoiarov and Gardaz because the cited references fail to teach or suggest each and every limitation of claim 1. *See* MPEP §2143. Applicants further submit that claims 2-11, which

depend from and incorporate all of the limitations of claim 1, are also nonobvious over the cited references. *See* MPEP §2143.03 (stating that if an independent claim is nonobvious under 35 U.S.C. §103, then any claim depending therefrom is nonobvious). Accordingly, for the reasons set forth hereinabove, Applicants request that the §103(a) rejections associated with claims 1-11 be withdrawn.

Claims 12-20

Applicants submit that currently amended claim 12 is nonobvious over Krasnoiarov in view of Gardaz because the cited references, whether considered alone or in combination, fail to teach or suggest each and every limitation of claim 12. *See* MPEP §2143. More particularly, Applicants submit that the combination of Krasnoiarov and Gardaz fails to teach or suggest, among other things, "delivering the content to a plurality of presentation devices," as recited in amended claim 12.

For substantially the same reasons as stated above in reference to claim 1, Applicants submit that independent claim 12 is nonobvious over the combination of Krasnoiarov and Gardaz because the cited references fail to teach or suggest each and every limitation of claim 12. *See* MPEP §2143. Applicants further submit that claims 13-20, which depend from and incorporate all of the limitations of claim 12, are also nonobvious over the cited references. *See* MPEP §2143.03. Accordingly, for the reasons set forth hereinabove, Applicants request that the §103(a) rejections associated with claims 12-20 be withdrawn.

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Conclusion

Applicants submit that no new matter has been added as a result of the present amendments. All of the stated grounds of rejection have been properly traversed, accommodated or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. There being no other rejections, Applicants respectfully request that the current application be allowed and passed to issue.
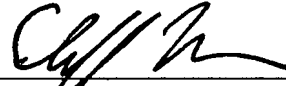
If the Examiner believes for any reason that personal communication will expedite prosecution of this application, I invite the Examiner to telephone me directly.

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AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be

required for this Response, or credit any overpayment, to deposit account no. 13-0019.

Dated: September 21, 2007

Respectfully submitted,
Mayer Brown LLP

By _____
Cliff Maier
   Registration No.: 59,526
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306-2112
Telephone: (650) 331-2026
Facsimile: (650) 331-2060

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